

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

v.

SCANA CORPORATION, DOMINION ENERGY
SOUTH CAROLINA, INC. (f/k/a SOUTH
CAROLINA ELECTRIC & GAS COMPANY),
KEVIN B. MARSH; and STEPHEN A. BYRNE,

Defendants.

Civ. Action No. 3:20-cv-882-MGL

**NOTICE OF MOTION AND CONSENT
MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Rule 6.01 of the Local Civil Rules for the U.S. District Court for the District of South Carolina (“Local Civil Rules”), Defendants SCANA Corporation, Dominion Energy South Carolina, Inc., Kevin B. Marsh, and Stephen A. Byrne, with the consent of counsel for Plaintiff United States Securities and Exchange Commission, hereby move the Court for an order extending the time within which Defendants must respond to Plaintiff’s Complaint (ECF No. 1), and, in support thereof, respectfully state the following:

1. Defendants’ current deadlines to respond to the Complaint are May 1, 2020 for Defendants SCANA Corporation, Dominion Energy South Carolina, Inc., and Mr. Byrne, and May 5, 2020 for Mr. Marsh. These deadlines have not been extended previously at the request of the parties.
2. On March 16, 2020, in response to the COVID-19 pandemic, Chief U.S. District Judge R. Bryan Harwell issued a Standing Order in Misc. No. 3:20-mc-105 (the “Standing Order”), extending deadlines in all civil cases by 21 days.

3. Defendants respectfully request the Court issue an order further extending Defendants' deadline to respond to the Complaint to July 1, 2020.
4. This extension is being sought in good faith for a proper purpose and is not intended to unduly or unnecessarily delay these proceedings. Specifically, this extension is necessary and appropriate given the complexity of the allegations and issues presented by Plaintiffs' lengthy Complaint and the limitations on Defendants and their counsel as a result of the COVID-19 pandemic.
5. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose. This extension would not affect other deadlines.
6. In accordance with Local Civil Rule 7.02, Defendants have conferred with counsel for Plaintiff prior to the filing of this Motion and Plaintiff consents to this extension.

WHEREFORE, Defendants move that this Court grant this Consent Motion and enter an Order providing that the time for Defendants to respond to the Complaint is extended through and including July 1, 2020.

Respectfully submitted,

We So Move:

s/ James M. Griffin

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March 24, 2020

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